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March 9, 2016

Via ECF

Honorable Robert M. Levy
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: No. 13 Civ. 04427-NGG-RML: Delgado et al v. Ocwen Loan Servicing, LLC et al.

Dear Judge Levy:

On behalf of Plaintiffs and the proposed class we write regarding two scheduling matters. First, we write to request Your Honor's further assistance regarding the parties' outstanding discovery disputes, which were briefly discussed during the March 1, 2016 status conference. Ms. Marino in Your Honor's chambers informs us that the Court is available for an in-person conference on April 1 at 1:00 p.m. Counsel for the parties are available during that time, though one or more attorneys may need to call into the conference.

In accordance with Your Honor's order during the March 1 conference, Plaintiffs propose March 25, 2016 as the deadline for letter submissions regarding outstanding discovery disputes, which relate to (i) Plaintiffs' request for limited supplemental ESI production, and (ii) the deficiencies in Defendants' privilege logs. Plaintiffs note, however, that Defendants' counsel has taken the position that Your Honor ordered full briefing on these two issues rather than letters setting forth the parties' positions. We conferred with defense counsel and told them that we understood Your Honor to have directed that letter briefs are sufficient for these issues. We believe this will be less of a burden on the Court and the parties, but we will of course defer to Your Honor's preference as to the manner of submission.

Second, the parties also request that the Court enter the following briefing schedule on Plaintiffs' Motion for Class Certification:

- April 15, 2016: Due date for Plaintiffs' opening papers; and
- June 17, 2016: Due date for Defendants' opposition.

Plaintiffs will request a date for their reply upon having reviewed Defendants' opposition.

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Thank you for the Court's consideration of this request.

Respectfully submitted,

/s/ J. Burkett McInturff
J. Burkett McInturff

cc: All Counsel of Record (via ECF)